

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,	:	x
	:	
Plaintiff,	:	
	:	18 Civ. 8175 (ER)
– against –	:	
	:	ECF CASE
BARRY C. HONIG, MICHAEL BRAUSER,	:	
JOHN STETSON, JOHN R. O'ROURKE III,	:	
ROBERT LADD, ELLIOT MAZA, BRIAN KELLER,	:	
JOHN H. FORD, ATG CAPITAL LLC, GRQ	:	
CONSULTANTS, INC., HS CONTRARIAN	:	
INVESTMENTS, LLC, GRANDER HOLDINGS, INC.,	:	
and STETSON CAPITAL INVESTMENTS INC.,	:	
	:	
Defendants.	:	
	x	

STIPULATION AND [PROPOSED] ORDER

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for Defendant Robert Ladd and Plaintiff Securities and Exchange Commission (“Commission”), that any and all discovery obtained by Defendant Ladd pursuant to his Rule 34 Document Request to the Commission (the “Discovery Material”) shall be retained by him in confidence and shall not be disclosed to or shared with (i) any other Defendant in this matter who (x) declines to produce documents in response to the Commission’s Rule 34 Document Request to him by reason of his assertion of an act of production privilege or any other assertion of his Fifth Amendment privileges, or by reason of his obtaining an extension from the Commission on his time to respond; or (y) has not executed the Confidentiality Stipulation and Order entered by the Court;

and (ii) any entity controlled by any such Defendant. Nothing herein shall preclude Ladd from disclosing such Discovery Material as part of a public filing made by Ladd in this matter.

Dated: New York, New York
May 22, 2019

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ROBERT LADD

SECURITIES AND EXCHANGE
COMMISSION

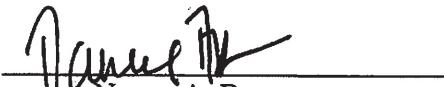
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Attorneys for Plaintiff Securities and Exchange
Commission

So Ordered:

UNITED STATES DISTRICT JUDGE